

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:24-cr-103-DPG-LGI

JODY E. OWENS II,
CHOKWE ANTAR LUMUMBA, and
AARON B. BANKS

**UNITED STATES' UNOPPOSED MOTION FOR EXTENSION OF TIME TO MEET
AND CONFER REGARDING DISCOVERY**

The United States, by and through the undersigned, requests that the Court grant a 45-day extension of time to complete discovery in this case and meet and confer with counsel for the defendants. Defense counsel for all defendants have been consulted on their position to this request and have no objection. In support of this request, the government states as follows:

1. On March 7, 2025, the Court set various deadlines related to this case and Ordered that the parties meet and confer no later than June 26, 2025, concerning outstanding discovery issues.
2. To date, the United States has produced several separate voluminous productions. This includes most (if not all) Rule 16 and *Jencks* material currently in its possession. An additional production that includes the body worn camera recordings that was captured during the execution of the search warrants at several locations in this case is forthcoming and will be produced within the next two weeks.
3. The government and counsel for two of the defendants have been engaged in good faith discussions to try and resolve questions and issues that have come up during the defense review of the discovery, and the government remains committed to trying and resolve this issue with all the defendants without Court intervention.

4. Due to the voluminous nature of this discovery, the parties have not all completed their meetings and conferences as Ordered by the Court. The United States therefore requests an additional 45 days to complete the production of discovery material currently in its possession and to meet with counsel for all three defendants pursuant to the Court's Order.

5. The parties do not believe this extension of time should have any impact on any other deadlines set by the Court in the Amended Order. (ECF No. 59).

Respectfully submitted,

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U.S. Department of Justice

/s/ Charles W. Kirkham

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CERTIFICATION OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which provided notice to all counsel of record.

Dated: June 26, 2025

/s/Charles W. Kirkham

Charles W. Kirkham

Assistant United States Attorney